

April 30, 2015

Richard P. Keigwin, Director  
Pesticide Re-Evaluation Division  
Environmental Protection Agency  
Office of Pesticide Programs  
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Washington, DC 20460  
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OPP Docket  
Environmental Protection Agency Docket  
Center (EPA/DC), (28221T)  
1200 Pennsylvania Ave. NW  
Washington, DC 20460-0001

Re: Comments on Proposed Chlorpyrifos Revised Human Health Risk Assessment  
EPA-HQ-OPP-2008-0850

Dear Mr. Keigwin,

We, the undersigned, write to express our support for a ban of the pesticide chlorpyrifos, which impairs brain development in children and causes acute poisonings, and to comment on EPA's Revised Human Health Risk Assessment for chlorpyrifos ("RHHRA"). Over a decade ago, EPA cancelled all homeowner uses of chlorpyrifos because of its high risk to children, but it allowed continued uses for agriculture. Rural communities, farmworkers and their families are therefore regularly exposed to chlorpyrifos, resulting in poisoning incidents each year and medical problems from acute and chronic exposure to this hazardous insecticide. In its current form, the RHHRA recommendations will fail to protect these children and adults who are regularly exposed to this dangerous nerve agent pesticide.

While EPA acknowledges overwhelming scientific evidence that demonstrate brain and neurodevelopmental impacts to children from exposure to chlorpyrifos during early life stages, the RHHRA would allow exposure levels that would continue to put children at risk of harm. Failing to regulate to protect against those acknowledged impacts is unacceptable and contrary to law.

The source of the problem is EPA's over-reliance on a mathematical model sponsored by the manufacturer of chlorpyrifos, Dow Agrosciences, that purports to pinpoint the precise exposures to women and kids that will cause adverse effects. Because Dow's model does not

assess the harmful neurodevelopmental effects, it would allow children to be exposed to the far lower doses that have been shown in real-world studies to increase the risk of learning and behavioral impairments. To make matters worse, the Dow model incorporates data from a study that intentionally dosed people with chlorpyrifos, which EPA's ethics expert found ethically deficient, and EPA's scientific peer reviewers found scientifically flawed. Despite the model's flaws EPA used it to reduce safety factors that are otherwise routinely employed to protect people from toxic pesticides. EPA's removal of safety factors leaves the public at risk, undermines public confidence, and favors industry interests over public health protection.

People may be exposed to chlorpyrifos from consuming contaminated food and water, and when it drifts from fields onto nearby communities. Studies show that off-target drift is a factor in a majority of reported pesticide-related illnesses. Although EPA established no-spray zones around schools, homes, hospitals and playfields, the small buffers proposed in the RHHRA will not protect children from neurodevelopmental impacts from low-dose exposures. The no-spray zones are only designed to reduce exposure from direct contact with treated fields, ignoring documented evidence that off-field drift poisons farmworkers and residents of rural communities each year. EPA's head in the sand approach leaves communities at risk in the places people live, learn, work, and play.

EPA's assessment acknowledges that farmworkers may continue to be exposed to dangerous levels of chlorpyrifos in over 100 activities they perform on the job. Nonetheless, EPA is not making any commitments to prevent these admittedly unsafe exposures. It is inexcusable that EPA knowingly allows workers to be at risk of poisoning on the job.

EPA has similarly identified a potential for extensive drinking water contamination from chlorpyrifos at levels high enough to pose a health risk to infants, but has failed to propose any prevention measures. EPA should not allow continued contamination of drinking water.

Because these harms disproportionately fall on farmworkers and their families, the vast majority of whom are low-income and people of color, EPA's failure to institute protective measures is out of compliance with basic principles of environmental justice and environmental justice executive orders. For all reasons stated above, we urge the EPA to cancel all uses of this highly toxic pesticide.

Sincerely,

Alliance of Nurses for Healthy Environments  
Americas for Conservation + the Arts & Americas Latino Eco Festival  
AZUL  
California Pan-Ethnic Health Network  
CATA - The Farmworker Support Committee

Center for Biological Diversity  
Center for Environmental Health  
Center for Reflection, Education and Action (CREA)  
Central California Asthma Collaborative  
Central California Environmental Justice Network  
Central Coast Alliance United for A Sustainable Economy (CAUSE)  
Central Florida Jobs with Justice  
Child Labor Coalition  
Cincinnati Interfaith Workers Center  
Clean Bread and Cheese Creek  
Clean Water and Air Matter (CWAM)  
Clean Yield  
Clínica Sierra Vista  
Columbia Legal Services  
Community to Community  
Community Water Center  
CREA  
Dolores Huerta Foundation  
Domestic Fair Trade Association  
Earthjustice  
East Coast Migrant Head Start Project  
Empire State Consumer Project, Inc.  
Epic-Environmental Protection Information Center  
Fair World Project  
Farm Labor Organizing Committee  
Farmworker Association of Florida  
Farmworker Health and Safety Institute (FHSI)  
Farmworker Justice  
Farmworker Self-Help  
Food Chain Workers Alliance  
Food in Neighborhoods (FIN)  
Global Community Monitor (GCM)  
GreenLatinos  
Hope Community Center  
Institute for Agriculture and Trade Policy  
International Labor Rights Forum (ILRF)  
Klamath Forest Alliance  
La Madre Tierra  
Labor Council for Latin American Advancement (LCLAA)  
League of United Latin American Citizens (LULAC)  
Leslie Fields, Sierra Club  
MAFO, Inc.

Maryland Organic Food and Farming Association  
Maryland Pesticide Education Network  
Mariya Strauss, Independent Journalist  
Media Voices for Children  
Medical Advocates for Healthy Air  
Migrant Clinicians Network  
MOMS Advocating Sustainability (MOMAS)  
Movement Generation: Justice and Ecology Project  
National Child Labor Committee  
National Consumers League  
National Farm Worker Ministry  
National Hispanic Environmental Council (NHEC)  
National Latina Institute for Reproductive Health  
Natural Resources Defense Council  
New Mexico Center on Law and Poverty  
Northwest Arkansas Workers' Justice Center (NWAJWC)  
Ocean Futures Society  
Other Worlds  
Parents for a Safer Environment  
Pesticide Action Network North America  
Physicians for Social Responsibility  
Pineros y Campesinos Unidos del Noroeste (PCUN)  
Promotores Comunitarios del Desierto  
Sisters of Charity Health System  
Sonen Capital  
Texas RioGrande Legal Aid, Inc.  
The Environmental Justice Coalition for Water  
Toxic Free NC  
Turning Green  
United Farm Workers (UFW)  
United Migrant Opportunity Services  
Veris Wealth Partners LLC  
Voces Verdes  
WeCount!  
Worksafe Inc.  
Youth & Young Adult Network of the National Farm Worker Ministry (YAYA-NFWM)